

ORIGINAL
EX PARTE OR LATE FILED

RECEIVED & INSPECTED

JUN 20 2003

FCC - MAILROOM

KPS CONSULTING

"Building an Access Bridge in Technology and Telecommunications"

3508 Albemarle Street, NW

Washington, DC 20008

202.363.5599

kpsconsulting@starpower.net

June 13, 2003

BY ELECTRONIC MAIL

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Presentations in CC Docket #98-67

Dear Ms. Dortch:

On June 12 and June 13, 2003, Rob Engelke, Pamela Holmes, and Kevin Colwell of Ultratec, Inc., and Karen Peltz Strauss as Ultratec's consultant met with various individuals at the Federal Communications Commission (FCC) to discuss the merits and status of a petition that had been filed by Ultratec, Inc. in the above referenced proceeding on April 12, 2003. The petition requested clarification of the FCC's rules on telecommunications relay services with respect to the provision and reimbursement of "Captioned Telephone," ("Captel"), an enhanced voice carry over (VCO) service that uses speech recognition technology to enable relay users to both hear and read telephone conversations. Attached is the presentation made to each of the individuals visited.

Ultratec met with each of the following individuals:

Office of Chairman Powell: Bryan Tramont
Office of the General Counsel: Trey Hanbury
Office of Commissioner Abernathy: Matthew Brill, Shannon Torgerson, Sara Pappas
Office of Commissioner Copps: Jessica Rosenworcel
Office of Commissioner Adelstein: Commissioner Adelstein, Lisa Zaina
Disability Rights Office: Cheryl King
Office of Commissioner Martin: Dan Gonzalez

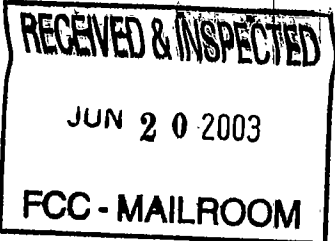
Sincerely,

Karen Peltz Strauss

Karen Peltz Strauss
Policy Consultant
Ultratec, Inc.

Attachment

No. of Copies rec'd 0
List A B C D E



Captel Trial Project Report

- I. Overview of Captel Trials
- II. Efficiency of Captel Calls - Cost Comparison of VCO vs. Captel
- III. New Segment of Population Served - Demographic Data Sampling of Captel Trialists
- IV. Consumer Evaluation of Captel in the Workplace

I. Overview of Captel Trials

Captel trials began October 1, 2002. Wisconsin was the first state to offer Captel service on a trial basis. As of June 2003, there are 13 Captel trials starting or underway, including the Federal Relay, which is open to any federal government employee across the nation. Eleven of the Captel trials limit participation to 200 trialists each with the remaining two states limiting participation to 100 trialists. Each state that has a trial has a lengthy waiting list with some people waiting since the beginning of their state trial. Additionally, Ultratec has received numerous inquiries from people around the country in non-trial states who have been waiting for over 20 months to use Captel.

In several states (see chart below), a number of short-term extensions have been granted with the anticipation the FCC will recognize Captel as an enhanced version of VCO and thus a reimbursable TRS offering. Some states have struggled to secure funding to continue Captel trial service while awaiting FCC approval. In several instances, states have not been able to use their TRS funds without Captel being a full service offering, and have had to find funding from other sources. Captel trialists in Wisconsin and Maryland have successfully written to their Governors and state legislative representatives to extend their state's trial service for a few more months.

As of July 1, 2003, the Captel trial service will be available seven days a week from 7 AM to midnight Central Time. It is anticipated that Captel service will extend to 24-7-365 within 90 days after an affirmative FCC ruling.

CapTel Trials

State	Trial Period	Trial Partner	Comments
Wisconsin	October 1, 2001 - October 31, 2003	Hamilton Telephone	Original Trial for 9 months extended to 18 months. Trial now extended from June 1, 2003 to October 31, 2003.
Maryland	March 1, 2002 - June 4, 2003	MD Relay	Original Trial for 9 months extended to 15 months. Committed to service beyond June 4, 2003.
Virginia	July 1, 2002 - March 31, 2003	VDHH	Trial is still in progress. Trying to extend to September 30, 2003.
Federal Government Relay	June 17, 2002 - August 31, 2003	Sprint	Original Trial for 9 months extended until August 31, 2003.
Washington	September 1, 2002 - August 31, 2003	Sprint	Extended until August 31, 2003.
Oregon	November 4, 2002 - July 31, 2003	Sprint	
Illinois	January 6, 2003 - September 30, 2003	Sprint	
Missouri	February 3, 2003 - July 31, 2003	Sprint	Committed to CapTel Service Starting on August 1, 2003.
California	March 3, 2003 - December 31, 2003	Sprint	
Minnesota	April 1, 2003 - December 31, 2003	Sprint	
Pennsylvania	May 3, 2003 - January 31, 2004	PA PUC	
Florida	June 1, 2003 - February 28, 2004	Sprint	
Hawaii	July 2003 - September 2003	Sprint	

II. Efficiency of CapTel Calls

Many CapTel trialists have commented on the ease and speed of CapTel calls. The state trial data shows that CapTel calls take on average, only 55% to 60% of the time for an average VCO call due primarily to two factors: the reduced call setup time and the increased speed of transcribing the far party's voice.

The data above is based on overall averages and not direct comparisons between identical calls. Two separate scripted calls with the exact same language and number of words were made a total of four times each to four different CapTel CAs and four different TRS VCO CAs. The results showed that in identical calls, CapTel took an average of approximately 50% of the time needed to make the same call using VCO.

The efficiency of CapTel is important for several reasons:

- Each call made using CapTel takes only 50% to 60% as much time as using traditional VCO and thus each call is less costly to the relay.
- Because of the substantial reduction in time to make the same call, each of the two participants in the call save time, making them more efficient in their work or other telephone use activities.
- The reduced time of the CapTel call saves one (or both) of the participants any long distance charges or use fees such as cellular phone costs associated with the call. (Note: A cellular CapTel phone is now in development. Currently, a CapTel phone on one end and a cell phone on the other end is commonly used.)

Cost Comparison of VCO vs. CapTel Calls

Data from billing records for TRS indicates that the average intrastate VCO call takes approximately 5.75 minutes. Data from the CapTel trials indicates that the average intrastate CapTel call takes approximately 3.25 minutes or about 56% of the time for the average VCO call. For example, using a per minute rate of \$1.50, the average VCO call would cost approximately \$8.63 and the average CapTel call approximately \$4.88.

III. New Segment of Population Served

The demographic data from the CapTel trials indicates that CapTel serves a broader segment of the deaf and hard of hearing population than is currently being served by existing relay programs. In addition, CapTel serves those VCO (and 2-line VCO) relay users who want to make use of their residual hearing and allows them to do so more efficiently and transparently with greater control of their calls.

Demographic Data Sampling of Captel Trialists

64 % of all trialists state they had not used relay before. Some had no phone access. These trialists relied on co-workers, friends or family to make calls for them.

84 % of all trialists state they use hearing aids or cochlear implants and want to make use of their residual hearing with text support in a manner similar to regular phone communications.

27 % of all trialists are in the 61+ age bracket. Many of these trialists are in their 80s-90s.

Captel is easily used by elderly individuals who might otherwise be intimidated by new technology. Senior citizens find that Captel operates much the same way they remember using the phone before they experienced hearing loss. Many trialists state they are now willing to use Captel for job-related calls and have the approval to do so from their employers.

IV. Consumer Evaluation of Captel in the Workplace

Trialists commented on how Captel makes getting a job, keeping a job, or getting promoted in a job possible. The evaluations and comments below are examples of the many received:

- The Captel system is absolutely fantastic. It allows me to have next to normal telephone conversations just like I used to have before I lost my hearing. It is very important to my job. Using Captel has improved the efficiency of my chambers and has saved on costs. - Judge, Circuit Court of Appeals
- I have become very accustomed to this kind of phone system at work. For the first time ever, I can pick up the phone, dial a co-worker, a community agency, or a child's parent and have an urgent discussion regarding a matter of importance. I cannot begin to explain how this system has simplified my duties at work. - Public School Psychologist
- I would have a significant loss of independence, efficiency and professionalism at work if I lose Captel! I would have to return to asking my co-workers to take calls for me and listen to voice mail messages, tell the caller to contact another staff person because I am unable to handle the call myself. This is quite embarrassing for me, a waste of my co-workers' time, and it also involves frustration and lack of confidentiality for the caller. - DVR Counselor
- I've become completely dependent on Captel at work. The Captel allows me to function both efficiently and independently. I can't imagine working a single day

without the Captel. There are literally hundreds of clients who use the Captel to contact me. I also use the Captel quite frequently to check my voice mail, make appointments, call my friends and family, etc. Losing access to the Captel would set me back significantly, both personally and professionally. - Clinical Research Program Manager

- At work I am the only worker during PM shift and the only way to effectively answer incoming calls is to retrieve messages through voicemail with Captel. This is because I need to press the buttons to follow through with the messages. I'm also taking transfer calls from my secretary or my coworkers through Captel to provide support for my customers. Right now I'm in the search for another job. I've already indicated on my resume to leave a message on my cell phone voicemail. That way, I can use my Captel phone to retrieve voicemail messages and then call the recruiter or company for the position I'm applying for. It is very important for me to make the call as if I'm a normal hearing person. Calling through relay service, in my experience, would not sell or promote me very well for any openings, especially supervisory positions requiring communication skills over the telephone. - Biomedical Technician, Meniter Hospital
- I have been using the Captel at work, and it has made a major impact on my ability to perform my professional duties. - Civil Rights Manager, USDA Forest Service
- Captel does make my job running much, much more efficient, and it certainly makes a difference. - Visual Information Specialist, U.S. Census Bureau
- I have come to be very dependent on the captioning feature at work! I am concerned that a day may come when I need to turn the telephone in and the service will end. I don't need to use it for every single call, but when I do need it, it is indispensable. I would very much like to be able to provide a Captel telephone and service for a client who is hard-of-hearing, and becoming employed, and who would otherwise be very fearful about any telephone tasks associated with a job that she could otherwise perform well. I believe that she would gain opportunities for employment if she could use Captel. Without telephone captioning, I know she would be too fearful to try a job that involves any telephone work. Captel is a very much-needed service in our community for working persons who are hard-of-hearing. - Vocational Rehabilitation Counselor
- I really like to Captel. It really helps me with my job. I used it to call out to people and do my job well. - University Educator
- As an administrative assistant, I find using Captel in my line of work a blessing. I don't have to depend on people making calls for me. I regularly use Captel to make all the same business calls a hearing administrative assistant is expected to make. I could not be an administrative assistant without Captel. At work, I have my own phone line and Captel, which allows me to do my job more effectively. I do not have to wait for someone to make a phone call for me, I just tell the person I am talking to that I am deaf and using a caption telephone, and that they may experience a slight delay in our conversation. This technology has improved my self-esteem, my work, and communication with my family. It is easy to use, and I love it! - Administrative Assistant, St. John's Academy

- My other party on the phone has shown such enthusiasm and appreciation that this technology is available and makes business dealings quicker, easier, and more professional. - Senior Contracting Officer, Veterans Administration National Acquisition Center
- It's made it easier for me to make business calls and explain the service myself in a way that doesn't confuse business people or cause them to hang up the phone thinking it is a phone salesman or some kind of prank call. - University Associate Professor, Doctoral Candidate
- It will advance my career, as well as others.' I'm now able to make sales calls independently and talk with prospective customers, making me feel more empowered to do what I'm paid to do. This is something that will benefit many, many people. - Telecom Sales Manager
- This device has improved my work performance tremendously, and in fact, has improved my working relationship at Metavante Corporation. - Quality Assurance Manager, Metavante Corporation
- I have been without my office assistant/interpreter for over one and half years now... CapTel has saved the day many times when I've needed to take a business call and could not wait until I had a freelance interpreter in the office. Business people do not in general have the time or patience that traditional relay calls take they seem to respond much better to calls made using CapTel! Thanks a million! - Bureau of Deaf and Hard of Hearing-Regional Coordinator
- CapTel has drastically improved the quality of my life. I compare this to when television started to close caption their programs back in the '80s-it was that great! - IRS, Chief Service Center Automation Section

Contact person:

Pamela Y. Holmes
Director, Consumer & Regulatory Affairs

Ultratec, Inc.
450 Science Drive
Madison, WI 53711

Email: pam.holmes@ultratec.com
Phone: 608-238-5400 Voice/TTY
1-888-892-5424 ext 608-238-9076 CapTel